

Attorneys for Defendants,
Las Vegas Limousines, LLC and
Frias Management, LLC

ASHLEY SILVER,

VS.

Defendants.

Mr. Potente is located in New York, and overnight travel (likely multiple days) would be required. Defendants are aware that cost and inconvenience are generally not considered good cause for an exception from the attendance requirements, but the Court

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1 is asked to consider in combination with these factors the fact there is a \$100,000 self-
 2 insured retention on this matter, little of which has been exhausted. While Defendants
 3 intend to come to the ENE for good faith negotiations, no scenario is envisioned in
 4 which insurance carrier funds would come into play at the ENE. Further, a settlement
 5 position will be formulated before the ENE, Mr. Potente would be available during the
 6 ENE by telephone as needed, and Defendants will be represented in person at the ENE.
 7 Finally, the AIG representatives are presently short-staffed by a person such that Mr.
 8 Potente is currently handling approximately 250 claims, which makes multiple days out
 9 of the office more difficult.
 10

FISHER & PHILLIPS LLP

/s/ Scott M. Mahoney, Esq.

SCOTT M. MAHONEY, ESQ.

300 S. Fourth Street

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Las Vegas, Nevada 89101

Attorneys for Defendants

CERTIFICATE OF ELECTRONIC SERVICE

18 This is to certify that on the 7th day of March 2017, the undersigned, an
 19 employee of Fisher & Phillips LLP, electronically filed the foregoing Motion for
 20 Waiver of Attendance of Insurance Carrier at ENE with the U.S. District Court, and a
 21 copy was electronically transmitted from the court to the e-mail address on file for:
 22

Angela J. Lizada, Esq.

By: /s/ Stacey Grata _____

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 3-17-2017